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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANGELA S. SANDUSKY,

Plaintiff,

v.

KILOLO KIJAKAZI,
 Acting Commissioner of Social Security,

Defendant.

Case No.: 2:23-cv-00003-EJY

**UNOPPOSED MOTION FOR
 EXTENSION OF TIME
 (FIRST REQUEST)**

Defendant, the Commissioner of Social Security, respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 12, filed on May 3, 2023), currently due on June 2, 2023, by 28 days, through and including June 30, 2023. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. Nos. 5 & 11) be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload, as described below. In the span of six workdays, Defendant's

1 counsel has nine briefing deadlines, including this matter. In May 2023, counsel completed numerous
2 other briefing assignments, including two Ninth Circuit answering briefs. Although counsel has
3 exercised due diligence, the requested additional time is necessary.

4 Additional time is required to review the record, to evaluate the issues raised in Plaintiff's
5 motion, to determine whether options exist for settlement, and if not, to prepare Defendant's response
6 to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as possible.
7 This request is made in good faith and with no intention to unduly delay the proceedings, and counsel
8 apologizes for any inconvenience.

9 On May 31, 2023, counsel for Defendant conferred with Plaintiff's counsel, who has no
10 opposition to this motion.

11 It is therefore respectfully requested that Defendant be granted an extension of time to respond
12 to Plaintiff's Motion for Reversal and Remand, through and including June 30, 2023.

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14 Dated: June 1, 2023

Respectfully submitted,

15 JASON M. FRIERSON
16 United States Attorney

17 /s/ Michael J. Mullen
MICHAEL J. MULLEN

18 Special Assistant United States Attorney
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22 IT IS SO ORDERED:

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24 UNITED STATES MAGISTRATE JUDGE

25 DATED: June 1, 2023
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